### SUMMARY OF THE ON-SITE ASSESSMENT COMMITTEE MEETING JANUARY 12, 2000

The On-site Assessment Committee of the National Environmental Laboratory Accreditation Conference (NELAC) met by teleconference on Wednesday, January 12, 2000, at 12:30 p.m. Eastern Standard Time (EST). In the absence of the committee's newly elected chair, Mr. William Ingersoll of the United States Navy, the meeting was led by Mr. R. Wayne Davis of the South Carolina Department of Health and Environmental Control and Ms. Marlene Moore of Advanced Systems, Incorporated. A list of action items resulting from the January 12 meeting is given in Attachment A. A cumulative list of outstanding action items identified and compiled by the committee is given in Attachment B. A list of participants is given in Attachment C. The purposes of the meeting were to update committee members on the development of the basic training course for NELAC assessors and to review, prioritize, and designate responsibility for outstanding committee action items.

#### Introduction

Mr. Davis explained that, as acting chair following Mr. Steven Baker's recent resignation from the committee, he had nominated Mr. Ingersoll for committee chair. The committee voted via emails submitted to Mr. Davis. Mr. Ingersoll received unanimous committee approval. Committee members expressed their willingness to assist Mr. Ingersoll as he becomes more familiar with the duties of the chair.

#### UPDATE ON BASIC TRAINING FOR NELAC ASSESSORS

Dr. Margot Hunt, U.S. Environmental Protection Agency (USEPA), joined the committee as an invited guest to provide an update on the development of the basic NELAC assessor training course. Dr. Hunt noted that she has reviewed final hard copy course materials received from the course development contractor and has made only a few minor spelling changes. Although Dr. Hunt had not yet reviewed Unit 18 (Summary) at the time of the meeting, she anticipated that she would review Unit 18 within the next two days. Dr. Hunt asked for committee input regarding whether the basic assessor course should include any mention of technical checklists. After moderate discussion, the committee unanimously agreed to recommend that the basic assessor training course include the Quality Systems (QS) checklist prepared by Mr. Charles Dyer, including Appendices C and D. Dr. Hunt indicated that she would make the necessary changes to the course materials to include the QS checklist. She noted that, barring any unexpected problems, the basic course would be ready by February 1, 2000. Dr. Hunt also noted that the course contractor would deliver to her some test bank questions and that she had received additional test bank questions from other individuals. Dr. Hunt indicated that she would consolidate questions and answers and forward them to the committee so that the committee can verify that the answers are correct.

#### REVIEW OF OUTSTANDING COMMITTEE ACTION ITEMS

The committee reviewed the consolidated list of outstanding action items compiled and distributed electronically by Ms. Moore prior to the meeting. Their discussion and disposition of these action items is summarized as follows:

#### • Item No. 1 - Committee teleconferences

In their December 7, 1999 teleconference, the On-site Assessment Committee set their tentative teleconference schedule through June 21, 2000. The committee has been notified by Ms. Lisa Doucet, USEPA, of teleconferences scheduled for January 26 and February 16, 2000. Ms. Moore indicated that she would assist Mr. Ingersoll in determining from Ms Doucet whether additional teleconferences have been scheduled.

#### • Item No. 2 - Preparation for Sixth NELAC Annual Meeting

Mr. Davis forwarded to committee members prior to the teleconference an e-mail from Ms. Doucet informing committee chairs of the following deadlines set for the Sixth Annual NELAC Meeting:

February 14, 2000 - Deadline to provide to the NELAC Executive Secretary an estimate of time needed for committee sessions

April 27, 2000 - Deadline to submit to the NELAC Executive Secretary final proposed changes to the Standards for posting on the NELAC web page

May 12, 2000 - Deadline to submit to the NELAC Executive Secretary final committee agendas

May 12, 2000 - Deadline to identify committee members whose terms are expiring, to vote upon replacement members, and to seek final approval of candidates from the NELAC chair

The committee briefly discussed membership issues. It was noted that, in addition to members whose terms are expiring in July, the committee must identify an immediate voting replacement for Mr. Baker. There was some debate of whether the committee would be best served by an individual with long-term experience with the NELAC process or an individual with more hands-on auditing experience and an awareness of issues facing new Accrediting Authorities (AA). Mention was also made of the impending merger of Severn Trent Laboratories with Quanterra, Inc., which would result in two committee members employed by the same company. Preparations for the Sixth NELAC Annual Meeting, including membership issues, were tabled for discussion at a future teleconference.

• Item No. 3 - Report on NELAC authority to approve assessor training courses and training providers

This item was tabled for discussion in the next scheduled committee teleconference. It was noted that Mr. Ingersoll, as chair, would determine Ms. Jeanne Hankins' availability

to report to the On-site Assessment Committee of her meetings with NELAC attorneys regarding NELAC authority in this area.

• Item No. 4 - Committee to consider approaching the NELAC Board of Directors (BoD) for approval to request assistance from USEPA's Office of Research and Development (ORD) Performance Based Measurement Systems (PBMS) Workgroup in generating PBMS-consistent technical checklists

It was generally agreed that this item, which originated as a suggestion made to the committee at the Fifth NELAC Interim Meeting, requires additional discussion and needs to be fleshed out by the committee. It was noted that the committee must first address the larger underlying question: Will the On-site Assessment Committee develop technical checklists and technical training courses? There being no resolution to this question, the issue was tabled for discussion at a future teleconference.

• Item No. 5 - Committee to draft a letter to BoD and AA outlining committee approach to technical course development

There was some discussion of whether such a letter is necessary. It was generally agreed that some courses to which the committee may refer may already be available. It was suggested that the committee might, instead, draft a letter requesting that individuals offering such courses provide a course outline for committee review. It was also agreed that the committee will address individually in its next teleconference, each of the issues included under this action item.

• Item No. 6 - Update of NELAC On-site Assessment Standard (Chapter Three) based on issues raised at the Fifth Interim NELAC Meeting

The committee was in general agreement that their action item to include certain issues in discussion at the Fifth NELAC Interim Meeting had been completed. They modified the action item, therefore, to review and update the Standard based on issues discussed at the meeting.

• Item No. 7 - Mr. Dyer to forward completed QS checklist to Ms. Hankins

This item was marked complete. In subsequent discussion of the checklist, the committee noted the need for an annual review and revision of the QS checklist for consistency with current NELAC Standards. Mr. Dyer also noted a minor numbering problem that he will correct when the checklist is revised for consistency with the July 2000 NELAC Standards.

• Item No. 8 - Coordination with NELAC QS Committee on issues that bridge the two committees

It was suggested that the two committees explore an exchange of minutes. After moderate discussion of the issue, Mr. Jack Hall accepted the assignment of reviewing QS

Committee minutes on an ongoing basis and updating the On-site Assessment Committee on issues pertinent to the committee. The logistics of how to obtain minutes for review were not resolved at this time.

• Item No. 9 - Coordination with AA on issues of reciprocity

It was decided that Mr. Dyer, as a representative of one of the first approved AA and a participant in AA teleconferences, will update the On-site Assessment Committee on issues pertinent to the committee.

• Item No. 10 - Training course issues and discussion

This item, particularly the issue of handling and administration of the final course examination, was retained on the committee's agenda for their January 26, 2000, teleconference.

• Item No. 11 - Changes to the NELAC On-site Assessment Standard (Chapter Three)

The committee discussed the need for a review and revision of Chapter Three to ensure its consistency with the other chapters of the NELAC Standards and with the basic assessor training course. It was noted that an assessor ethics requirement is included in the basic training course, but is not included in Chapter Three. The committee also addressed the Assessor Training Manual currently posted on the NELAC Website. Several committee members expressed the opinion that the manual's value is as an historical record. Consequently, they recommended that the manual be archived and that the Standard be adjusted to remove references to the manual. It was suggested that such action be placed on the committee's voting agenda for the Sixth NELAC Annual Meeting. The issue was tabled for resolution in future committee discussion.

• Item No. 12 - Consistency issues in the completion of assessor checklists

Discussion of this issue focused on the use of the checklist "Comment" field. Committee members noted that the current NELAC Standard does not specify whether the "Comment" field is to be used to record objective evidence supporting an assessor's evaluation of a checklist item, subjective assessor comments, or guidance for the laboratory. It was suggested that the committee recommend wording changes to the Standard to provide guidance for consistent completion of assessor checklists. Ms. Susan Davis accepted the assignment of reviewing the NELAC On-site Assessment Standard and drafting proposed language for review by the committee.

• Item No.13 - Evaluation criteria for on-site assessment

In discussion of this issue, it was suggested that the decision not to approve a laboratory might be based on (a) multiple findings that do not conform to NELAC, (b) the unwillingness of the laboratory to take appropriate corrective action in a timely manner, (c) repetitive findings of deficiencies between assessments, or (d) a statistical evaluation

based on the number of observations for declaring a deficiency. Again it was noted that the current NELAC Standard does not specifically address the issue and that including language to define evaluation criteria for on-site assessment would ensure consistency. Mr. Jack Hall accepted the assignment of reviewing the Standard and drafting proposed language for review by the committee.

• Item No. 14 - Committee response to comments received from state agencies and other individuals

The committee discussed comments received from several state agencies, representatives, or workgroups to whom they had not yet submitted a committee response. They noted comments received from the states of Oklahoma, Utah, Virginia, and Wisconsin, and the city of Austin, Texas, as well as comments from the NELAC Field Measurements ad hoc Committee, radiological PBMS comments on drinking water versus other programs, and comments received from Ms. Moore on the On-site Assessment Standard. Rather than listing all comments under one action item, the committee decided to identify each set of comments as a discrete action item to be assigned to an individual committee member for response. Ms. Moore encouraged all committee members to review their files for additional comments to which the committee had not yet replied. Since many of the committee members in attendance noted that they did not have a copy of the comments received from the NELAC Field Measurements ad hoc Committee, Ms. Moore indicated that she would distribute the comments for committee review. It was suggested that Mr. Ingersoll communicate through the NELAC BoD a request that all commenters who have not received an On-site Assessment Committee response resubmit their comments in writing to the committee. Mr. Davis informed the committee that he had not yet revised his letter to the Oklahoma Department of Environmental Quality, but anticipated that he would do so by the end of January.

#### **NEW BUSINESS**

Ms. Davis informed the committee that she is reviewing the December 1, 1999, regulatory changes to the Safe Drinking Water Act (SDWA) consisting of new approved methods for drinking water analysis. She will report to the committee in a future teleconference.

The committee discussed ways in which they might communicate On-site Assessment Committee activities to other NELAC committees and to the BoD. It was suggested that a compendium of committee action items might be maintained and used for this purpose. The committee indicated that they would review other opportunities for communication of On-site Assessment Committee activities to interested parties.

#### **CONCLUSION**

Having reviewed, prioritized, and made committee assignments for their outstanding action items, the committee agreed to adjourn the meeting in order to review the adjusted items. Ms. Moore indicated that she would recompile and distribute the list of outstanding action items to committee members. She also indicated that she would inform Mr. Ingersoll of those items for which he, as

chair, has principal responsibility. The next On-site Assessment Committee teleconference is scheduled for January 26, 2000, at 12:30 p.m. EST. The committee meeting was adjourned shortly before 2:30 p.m. EST.

## ACTION ITEMS ON-SITE ASSESSMENT COMMITTEE MEETING JANUARY 12, 2000

Item No.	Action	Date to be Completed	
1.	Mr. Ingersoll will contact Ms. Doucet to determine the Onsite Assessment Committee's teleconference schedule beyond February 16, 2000.	01/26/99	
2.	Ms. Moore will recompile and distribute the On-site Assessment Committee's modified compendium of outstanding action items to committee members.	Complete	
3.	Ms. Moore will compile and distribute for committee review those comments from state representatives and workgroups that she has on file.	Complete	
4.	On-site Assessment Committee members will review their files to identify additional comments that have not been addressed by the committee and will forward these comments to Ms.  Moore for distribution to the committee.		
5.	Mr. Ingersoll will recommend to the NELAC BoD that individuals who have submitted comments to the On-site Assessment Committee and have not yet received a committee response resubmit their written comments to Mr. Ingersoll.	01/18/00 ?	
6.	Mr. Davis will revise for committee review the letter he has drafted in response to comments received from the Oklahoma Department of Environmental Quality.	01/26/00	
7.	Dr. Hunt will make necessary changes to the basic assessor training course to include the QS Checklist prepared by Mr. Dyer, including Appendices C and D.	02/01/00	
8.	Dr. Hunt will consolidate basic assessor training course test bank questions and answers and distribute to committee members so that committee can verify that answers are correct.		
9.	Mr. Ingersoll will determine Ms. Hankins' availability to report to the On-site Assessment Committee on the outcome of her meetings with NELAC attorneys regarding NELAC authority to approve assessor training courses and training providers.		
10.	Mr. Hall will review NELAC Quality Systems Committee meeting minutes on an ongoing basis and will update the Onsite Assessment Committee on issues bridging the two committees.	Ongoing	

Item No.	Action	Date to be Completed
11.	Mr. Dyer will update the On-site Assessment Committee on an ongoing basis on AA issues that are pertinent to the committee.  Ongoing	
12.	Ms. Davis will draft for committee review proposed language changes to the NELAC On-site Assessment Standard (Chapter Three) to provide guidance for consistent completion of assessor checklists.	02/16/00
13.	Mr. Hall will draft for committee review proposed language changes to the NELAC On-site Assessment Standard (Chapter Three) to define evaluation criteria for on-site assessments.	
14.	Ms. Davis will review December 1, 1999, SDWA regulatory changes for report to the On-site Assessment Committee.	
15.	The On-site Assessment Committee will place on their voting agenda for the Sixth NELAC Annual Meeting the archiving of the Assessor Training Manual currently posted on the NELAC web page and the adjustment of the NELAC Standard to remove references to the manual.	
16.	The On-site Assessment Committee will revise the Quality Systems Checklist for consistency with the July 2000 NELAC Standards.	08/01/00

# COMPENDIUM OF OUTSTANDING ACTION ITEMS ON-SITE ASSESSMENT COMMITTEE AS OF JANUARY 12, 2000

Item	Action	Responsible	Date to be
No.		Member	Completed
1.	The following teleconference dates are set: January 26, 2000, February 16, 2000; 12:30 p.m 2:30 p.m. EST		Complete
	Additional dates to be scheduled: March 1, 2000; March 22, 2000; April 12, 2000; April 26, 2000; May 10, 2000; May 24, 2000; June 7, 2000; and June 21, 2000.	W. Ingersoll to contact L. Doucet, EPA	1/26/00
	NELAC 6 meeting 6/26-29/00 - Williamsburg.		
2.	NELAC Annual meeting preparation:		
	Provide an estimate of the total time needed for your Committee's NELAC 6 session(s) to Exec Sec.		2/14/00
	Submit final changes to the Standards for posting on the NELAC web page prior to the annual meeting.		4/27/00
	Submit final Committee agendas for the annual meeting.		5/12/00
	Replacement of committee members whose terms are expiring - All candidates must be identified and voted upon by NELAC Committees.		5/12/00
3.	Ms. Hankins will meet with the On-site Assessment Committee to give them a full report of her meetings with NELAC attorneys regarding NELAC authority to approve assessor training courses and training providers.	W. Ingersoll to invite J. Hankins to next call to report on issue	1/31/00
4.	Committee to review the following and determine actions. Needs committee discussion.		1/31/00
	The On-site Assessment Committee will consider approaching the NELAC BOD for approval to ask support of the USEPA's ORD PBMS Workgroup in:  1) generating checklists covering all QC items included in USEPA mandated test methods for drinking water and waste water analysis, and 2) listing for the On site Assessment Committee		
	2) listing for the On-site Assessment Committee those methods thought to be procedurally defined.		

Item No.	Action	Responsible Member	Date to be Completed
5.	Committee to review the following and identify actions to be taken for each item:		1/26/00
	The technical course approach will be evenly split between data audit and systems audit. (Is development of technical checklists to continue?)		
	The final exam will cover both data audit and systems audit and will include at least one data packet.		
	<ul> <li>Data packets will be tailored to the course discipline.</li> </ul>		
	Technical courses will be developed in at least the areas of microbiology, asbestos analysis, radiochemistry, wet chemistry, organic chemistry, and inorganic chemistry. (Is development of technical courses to continue?)		
	The On-site Assessment Committee     proposes that the microbiology course be     developed fairly quickly.		
6.	Committee to review and update standard based on following issues discussed at the Fifth Interim NELAC Meeting:		
	a) Clarification of whether AARB monitors EPA or NELAP b) Clarification of CBI issues, including whether third party assessors may sign CBI papers on behalf of the Accrediting Authority and whether non-government employees are held to the same accountability standards as government employees c) Issue of reciprocity arising from question of whether an assessor must review all laboratory SOPs or a statistical sample of the SOPs d) Issue of "adequacy" of SOPs, including committee's suggested three-item clarification language (see minutes) e) Issue of expanding the Basic NELAC Assessor Training Course, including soliciting input from NELAC stakeholders as to level of detail needed in the course f) Review of NELAC On-site Assessment and Quality Systems Standards to be sure that they are consistent		
7.	Mr. Dyer will e-mail completed Quality Systems Checklist to Ms. Jeanne Hankins for duplication for the fifth interim NELAC meeting.		Complete
7a.	Quality Systems Checklist updated after annual meeting.	C. Dyer	8/01/00

Item No.	Action	Responsible Member	Date to be Completed
8.	Committee to explore receiving minutes from QS	W. Ingersoll	_
	committee prior to web posting.	J	
	Committee to review QS minutes for impact on Chapter 3 and training course contents.	J. Hall	
9.	Committee will review minutes from Accrediting	C. Dyer	
	Authorities meetings for impact on Chapter 3 and	J	
	training course contents.		
10.	Training Course Issues and discussion	Dr. Hunt	1/26/00
	Final Course Exam - handling and administration		
11.	Chapter 3 revisions - Consistency with other		
	chapters and with training course		
	Assessor ethics requirement in training		
	course, but not standard.		
	Removal of Assessor Training Manual	L. Greene	1/26/00
	reference(s) in Chapter 3. Determine how		
	this is to be accomplished and start		
12.	preparation for next meeting.	S. Davis	2/16/00
12.	Recommend wording for standard changes (Chapter 3) to ensure consistency of completing the checklist	S. Davis	2/10/00
	i.e. record of evidence observed or just deficiencies		
	observed. Recommend wording for standard		
	changes relating to guidance for providing		
	recommendations and subjective comments. (See S.		
	Davis, City of Austin, e-mail, 12/20/99?)		
13.	Recommend wording for standard changes (Chapter	J. Hall	2/16/00
	3) to define evaluation criteria for onsite assessment.		
	These include barriers for not approving a lab based		
	on multiple findings, unwillingness to take corrective		
	action within specified time frame or repetitive		
	findings between audit or statistical certainty based		
	on number of observations for declaring a		
1 /	deficiency.	Q D'	
14.	Review EPA Office of Water regulations issued 12/1/99 for SDWA for consistency with Chapter 3	S. Davis	
	standard. Identify inconsistencies for review.		
15.	Review opportunities for communication of On-site		+
13.	Assessment Committee activities to other committees		
	and Board of Directors.		
20.	Prepare response to comments received from the		1
-0.	NELAC Field Measurements Committee. (See J.		
	Hosenfield e-mail, 3/20/99, Chap3RV4.wpd)		
21	Finalize letter communicating the On-site	W. Davis	1/31/00
	Assessment Committee's response to comments		
	received from the state of Oklahoma.		
22.	Radiological PBMS comments, DW versus other	W.Ingersoll	
	programs (See e-mail to Steve Baker 12/13/99)		
23.	Utah comments (D. Mendenhall) 12/30 e-mail from		
	Wayne (Marlene cannot find reference needs to be		
	added to the attached.)		

### **Attachment B**

Item No.	Action	Responsible Member	Date to be Completed
24.	Va Work Group comments (See letter 9/98)		
25.	Wisconsin DNR comments (See Tami Viers e-mail, tviers@voyager.net, 2/19/99)		
26.	Wisconsin comments Alfredo Sotomayor (See email, 3/30/99, cmmtsnlcstdschpt3399.doc)		
27.	Comments on Chapter 3 (See e-mail Marlene Moore resent 1/10/00)		

## PARTICIPANTS ON-SITE ASSESSMENT COMMITTEE MEETING JANUARY 12, 2000

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